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15 [Additional counsel appear on signature page]

16 UNITED STATES DISTRICT COURT

17 DISTRICT OF NEVADA

18 **Cung Le, Nathan Quarry, Jon Fitch, Brandon**
19 **Vera, Luis Javier Vazquez, and Kyle**
20 **Kingsbury on behalf of themselves and all**
others similarly situated,

21 **Plaintiffs,**

22 **vs.**

23 **Zuffa, LLC, d/b/a Ultimate Fighting**
24 **Championship and UFC,**

25 **Defendant.**

Case No.: 2:15-cv-01045 RFB-(PAL)

**PLAINTIFFS' MOTION FOR LEAVE TO
LODGE MATERIALS UNDER SEAL RE
MOTION FOR A LETTER OF REQUEST**

1 Pursuant to Rules 5.2 and 26(c) of the Federal Rules of Civil Procedure, Local Rule 10-5(a),
2 and Section 14.3 of the Revised Stipulation and Protective Order (the “Protective Order”) issued by
3 this Court on February 10, 2016 (ECF No. 217 at 15), Plaintiffs Cung Le, Nathan Quarry, Jon Fitch,
4 Brandon Vera, Luis Javier Vazquez, and Kyle Kingsbury on behalf of themselves and all others
5 similarly situated (collectively, “Plaintiffs”) hereby move this Court for leave to lodge certain
6 documents under seal related to their Motion for a Letter of Request for Documents From Group
7 One Holdings Pte. Ltd. (“Group One”).

8 Under Section 14.3 of the Protective Order, documents designated Confidential or Highly
9 Confidential – Attorneys’ Eyes Only “shall be provisionally lodged under seal with the Court, and
10 redacted papers shall be publicly filed. Within 5 days of the materials being lodged with the Court,
11 the Party claiming protection shall file motion to seal setting forth the bases for sealing and proper
12 authority under *Kamakana v. City & County of Honolulu*, 447 F.3d 1172 (9th Cir. 2006), or some
13 other applicable authority.” Accordingly, Plaintiffs seek leave to lodge the following documents
14 under seal.

15 First, Plaintiffs seek leave to lodge under seal portions of Plaintiffs’ Motion for a Letter of
16 Request for Documents From Group One Holdings Pte. Ltd. The sealed portions refer to materials
17 that have been designated Confidential or Highly Confidential – Attorneys’ Eyes Only by Zuffa or
18 Group One.

19 Second, Plaintiffs seek leave to lodge under seal Exhibits 2, 7, and 8 to the Rayhill
20 Declaration, which are the documents that have been designated Confidential or Highly
21 Confidential – Attorneys’ Eyes Only.

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1 Plaintiffs have filed all of these documents under seal, in accordance with the Court's ECF
2 system, with the instant motion. Plaintiffs have publicly filed placeholders for redacted versions of
3 these documents with the Court, and will serve un-redacted versions of these documents on
4 Defendant.

5 DATED this 20th day of June, 2017.

6 **JOSEPH SAVERI LAW FIRM, INC.**

7 By: /s/ Kevin E. Rayhill

8 Kevin E. Rayhill

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CERTIFICATE OF SERVICE

I hereby certify that on this 20th day of June, 2017 a true and correct copy of
PLAINTIFFS' MOTION TO LODGE MATERIALS UNDER SEAL was served via the
United States District Court CM/ECF system on all parties or persons requiring notice.

By:

/s/ Kevin E. Rayhill

Kevin E. Rayhill